IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

SMARTMATIC USA CORP., SMARTMATIC INTERNATIONAL HOLDING B.V., and SGO CORPORATION LIMITED,

Plaintiffs,

v.

MICHAEL J. LINDELL and MY PILLOW, INC.,

Defendants.

Case No. 22-cv-0098-JMB-JFD

PLAINTIFFS' SECOND MOTION TO SHOW CAUSE

Plaintiffs Smartmatic USA Corp., Smartmatic International Holding B.V., and SGO Corporation Limited (collectively, "Smartmatic"), by and through their undersigned counsel, hereby move this Court for an order certifying the facts in their Memorandum of Law in Support of their motion and ordering Defendants to appear in front of Judge Bryan to show cause as to why they should not be held in contempt for violating this Court's prior discovery orders. The reasons for this motion are set forth in Smartmatic's Memorandum of Law In Support of Plaintiffs' Second Motion to Show Cause and accompanying exhibits.

Dated: December 9, 2024 Respectfully submitted,

/s/ Julie M. Loftus

Christopher K. Larus
Minnesota Bar No. 0226828
CLarus@robinskaplan.com
William E. Manske
Minnesota Bar No. 0392348
WManske@robinskaplan.com

Emily J. Tremblay Minnesota Bar No. 0395003 ETremblay@robinskaplan.com

ROBINS KAPLAN LLP

800 LaSalle Avenue, Suite 2800 Minneapolis, MN 55402 Telephone: (612) 349-8500

J. Erik Connolly (admitted *pro hac vice)* EConnolly@beneschlaw.com Illinois ARDC No. 6269558

Nicole E. Wrigley (admitted *pro hac vice*) NWrigley@beneschlaw.com

Illinois ARDC No. 6278749

Timothy M. Frey (admitted *pro hac vice*) TFrey@beneschlaw.com

Illinois ARDC No. 6303335

Julie M. Loftus (admitted pro hac vice)

JLoftus@beneschlaw.com

Illinois ARDC No. 6332174

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

71 South Wacker Drive, Suite 1600 Chicago, IL 60606 Telephone: (312) 212-4949

James R. Bedell (admitted *pro hac vice*)
JBedell@beneschlaw.com
Ohio Bar No. 97921

BENESCH, FRIEDLANDER, COPLAN & ARONOFF LLP

127 Public Square, Suite 4900 Cleveland, OH 44114 Telephone: (216) 363-4500

Attorneys for the Plaintiffs